

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WISCONSIN**

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**Case No.:** 09-33787  
**Judge:** Susan V. Kelley  
**Chapter:** Chapter 13

**In Re: Todd C Leeser**

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**NOTICE AND REQUEST TO MODIFY CHAPTER 13 PLAN**

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Geraci Law, LLC, Attorneys for the Debtor, have filed papers with the court requesting modification of the Chapter 13 Plan in the above case.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the court to modify the plan as proposed, or if you want the court to consider your views on the request, on or before 21 days from the date of this notice, you or your attorney must:

File with the court a written request for hearing which shall contain a short and plain statement of the factual and legal basis for the objection. File your written request at:

Clerk, U.S. Bankruptcy Court  
517 E. Wisconsin Ave., Rm. 126  
Milwaukee, WI 53202

If you mail your request or response to the court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above.

You must also mail a copy to the parties listed below and on the attached mailing matrix:

Andrew M. Golanowski  
Geraci Law, LLC  
2505 N. Mayfair Road, Suite 101  
Wauwatosa, WI 53226  
Phone: (414) 475-6052  
Fax: (877) 247-1960  
Email: [wal@geracilaw.com](mailto:wal@geracilaw.com)

United States Trustee  
Eastern District of Wisconsin  
517 East Wisconsin Avenue, Room 430  
Milwaukee, WI 53202

Mary B. Grossman  
Chapter 13 Trustee  
P.O. Box 510920  
Milwaukee, WI 53203

Geraci Law, LLC  
Andrew M. Golanowski  
2505 N. Mayfair Rd. #101  
Wauwatosa, WI 53226

Todd C Leeser  
  
409 W State St  
Burlington, WI 53105

If you or your attorney do not take these steps, the court may decide that you do not oppose the request and may enter an order modifying the Plan.

### **REQUEST TO MODIFY CHAPTER 13 PLAN**

1. The Proponent of this modification is the Debtor, through his Attorneys, Geraci Law, LLC.
2. This is a request to modify a Chapter 13 Plan (Select A. or B.):
  - A. ☒ post-confirmation
  - B. ☐ pre-confirmation (Select i. or ii.);
    - i. ☐ Debtor(s)/Debtor(s) attorney certifies that the proposed modification does not materially or adversely affect creditors (Local Bankruptcy Rule 3015(b)); or
    - ii. ☒ Debtor(s)/Debtor(s) attorney certifies that the proposed modification materially adversely affects only the following creditors and a copy of the proposed modification has been served on them (Local Bankruptcy Rule 3015(b)). The creditors are (See Attached List).
3. The Proponent wishes to modify the Chapter 13 Plan to do the following: See Below.

4. The reason for the modification is to provide for missed payments due to temporary reduced work hours.

5. Select A. or B.

A.   X   The confirmed Chapter 13 Plan is modified as follows: Debtor was on reduced hours due to lack of work. Debtor will resume payments to the Trustee in March 2013, at \$1,445 per month. Allowed general unsecured claims shall still receive not less than 100% of their claims.

B.        The unconfirmed Chapter 13 Plan is modified as follows:

C. All remaining terms and provisions of the Plan are unaffected unless specifically addressed herein. In the event of a conflict between the original Plan and the modification set forth above, the latter shall supersede and control.

**6. BY SIGNING BELOW THE PROPONENT OF THE MODIFICATION CERTIFIES THAT, AFTER REVIEW OF THE MODIFICATION AND ALL OTHER TERMS AND PROVISIONS OF THE PLAN, THOSE REMAINING TERMS AND PROVISIONS OF THE PLAN ARE CONSISTENT WITH THE PROPOSED MODIFICATIONS.**

WHEREFORE, the Proponent requests that the Court approve the modification to the Chapter 13 Plan as stated herein.

Respectfully submitted and dated this Saturday, February 16, 2013.

By: /s/ Andrew M. Golanowski  
Andrew M. Golanowski  
Attorney for Debtor  
Bar #: 1055499

Andrew M. Golanowski  
Geraci Law, LLC  
2505 N. Mayfair Road, Suite 101  
Wauwatosa, WI 53226  
Phone: (414) 475-6052  
Fax: (877) 247-1960  
Email: [wal@geracilaw.com](mailto:wal@geracilaw.com)

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**CERTIFICATE OF SERVICE**

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The undersigned, an Attorney, does hereby certify that a copy of this Certificate of Service and a copy of the attached Notice and Request to Modify Chapter 13 Plan were mailed First Class to the persons mentioned below, at their respective addresses, postage prepaid, by U.S. Mail in Milwaukee, WI on Saturday, February 16, 2013:

Todd Leeser  
409 W State St  
Burlington, WI 53105

**SEE ATTACHED LIST**

Additionally, the documents referenced above were also served via electronic means on the following individuals on Saturday, February 16, 2013:

United States Trustee  
Eastern District of Wisconsin  
517 E. Wisconsin Ave.  
Milwaukee, WI 53202

Mary B. Grossman  
Chapter 13 Trustee  
P.O. Box 510920  
Milwaukee, WI 53203

Dated this Saturday, February 16, 2013.

By: /s/ Andrew M. Golanowski  
Andrew M. Golanowski  
Attorney of the Debtor  
Bar #: 1055499

Andrew M. Golanowski  
Geraci Law, LLC  
2505 N. Mayfair Road, Suite 101  
Wauwatosa, WI 53226  
Phone: (414) 475-6052  
Fax: (877) 247-1960  
Email: [wal@geracilaw.com](mailto:wal@geracilaw.com)

Guaranty Bank  
Attn: Bankruptcy Dept.  
21731 Ventura Blvd  
Woodland Hills, CA 91364

Chase  
Attn: Bankruptcy Dept.  
800 Brooksedge Blvd  
Westerville, OH 43081

BAC Home Loans Servicing  
Attn: Bankruptcy Dept.  
450 American St  
Simi Valley, CA 93065

Chase  
Attn: Bankruptcy Dept.  
800 Brooksedge Blvd  
Westerville, OH 43081

Wells Fargo Home Mortgage  
Attn: Bankruptcy Dept.  
8480 Stagecoach Cir  
Frederick, MD 21701

MB Financial Bank  
Attn: Bankruptcy Dept.  
1200 N Ashland Ave  
Chicago, IL 60622

Equifax  
Attn: Bankruptcy Dept.  
P.O. Box 740241  
Atlanta, GA 30374

Wisconsin Dept. of Revenue  
Bankruptcy Notice  
2135 Rimrock Road  
Madison, WI 53713

Experian  
Attn: Bankruptcy Dept.  
P.O. Box 2002  
Allen, TX 75013

TransUnion  
Attn: Bankruptcy Dept.  
P.O. Box 1000  
Chester, PA 19022

Citigo/CBSD  
Attn: Bankruptcy Dept.  
Po Box 6497  
Sioux Falls, SD 57117

Amex  
Attn: Bankruptcy Dept.  
Po Box 297871  
Fort Lauderdale, FL 33329

HSBC/Polaris  
Attn: Bankruptcy Dept.  
90 Christiana Rd  
New Castle, DE 19720

Discover  
Attn: Bankruptcy Dept.  
Po Box 15316  
Wilmington, DE 19850

Bank of America  
Attn: Bankruptcy Dept.  
Pob 17054  
Wilmington, DE 19884